

Exhibit 62

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

COALITION FOR TJ,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 1:21-cv-00296-CMH-JFA
)	
FAIRFAX COUNTY SCHOOL BOARD,)	
)	
Defendant.)	

DEFENDANT’S NOTICE OF DEPOSITION OF PLAINTIFF

Please take notice that, pursuant to Fed. R. Civ. P. 30(b)(6), the Defendant, Fairfax County School Board, will take the deposition by oral examination of Plaintiff Coalition for TJ, through one or more of its officers, directors, managing agents or other persons, who consent to testify on its behalf, beginning at **9:00 am on October 12, 2021**, at the offices of Hunton Andrews Kurth, LLP, 8405 Greensboro Drive, Suite 140, Tysons Corner, Virginia 22102. The deposition will be recorded by stenographic and videographic means, will be taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure. The deposition will last from day-to-day, if necessary, until it is completed. Pursuant to Fed. R. Civ. P. 30(b)(3), the School Board gives notice to Plaintiff and to all counsel that this deposition may be videotaped.

Plaintiff is directed to designate one or more officers, directors, managing agents or other persons who consent to testify on its behalf and who have knowledge of and are adequately prepared to testify on each of the topics listed under “Topics for Examination” below.

DEFINITIONS

A. “You,” “your,” and “Plaintiff,” refer to Plaintiff Coalition for TJ, its leaders, representatives, members, agents, consultants, experts, attorneys, and anyone acting on its behalf.

B. “Lawsuit” refers to the Complaint (and any amended complaint) filed in *Coalition for TJ*, currently pending in the United States District Court for the Eastern District of Virginia, Case No. 1:21-cv-00296-CMH-JFA.

C. “TJ” means the Thomas Jefferson High School for Science and Technology.

D. “Communication” means any oral or written transmission of words, thoughts, ideas, or information from one person to another person(s), including, without limitation, by telephone, text message, instant message, letter, facsimile, electronic mail, or any other means.

E. “Person” means any individual, partnership, corporation, association, trust, or other business entity, or any government department or agency

F. “Social media site” means an online communication channel for user-based input, interaction, content-sharing or collaboration, and specifically includes, but is not limited to, Facebook, SnapChat, Instagram, Twitter, MySpace, YouTube, Flickr, Foursquare, Google+, Reddit, Telegram, Tumblr, LinkedIn, Pinterest, and any blog.

TOPICS FOR EXAMINATION

1. Plaintiff’s formation and its organizational documents;
2. Plaintiff’s mission, internal governance rules, and organizational structure;
3. Meetings of Plaintiff’s leadership team, committees, members, and/or supporters;
4. The composition and formation of each of Plaintiff’s membership tiers, including its leadership, membership, and supporters;
5. The identities, roles, responsibilities, activities, and authority of each of Plaintiff’s leadership team and committees;

6. The requirements to become a leader, member, or supporter of Plaintiff, and the processes or procedures by which Plaintiff's leaders, members, and supporters were selected or joined Plaintiff;

7. Plaintiff's finances and funding sources and operating budget and expenditures;

8. Communications between and among Plaintiff's membership, including leaders, members, or supporters of Plaintiff, relating to TJ;

9. The process by which Plaintiff made the decision to file the Lawsuit;

10. Plaintiff's Telegram groups, or discussion groups on any other messaging platform, and any messages exchanged through such groups;

11. Communications between or among Plaintiff or any individuals on its core leadership team and the Fairfax County School Board, including any of its members, employees or agents, relating to TJ or the TJ admissions process;

12. Public statements, press releases, or statements on any Social Media Sites made by or on behalf of Plaintiff, including communications between Plaintiff (including any of its leaders or members) and any representative or employee of any media organization;

13. Any solutions or alternative proposals for TJ admissions prepared by Plaintiff or on behalf of Plaintiff;

14. Plaintiff's responses to Defendant's document requests and interrogatories in the Lawsuit;

15. The factual bases for Plaintiff's claim that the 2020 changes to the TJ admissions process were intended to discriminate against Asian Americans;

16. The factual bases for Plaintiff's assertion that the School Board changed the TJ admissions process in order to achieve racial balance or proportionality at the school;

17. The factual bases for Plaintiff's claim that the 2020 changes to the TJ admissions process have a disparate impact on Asian Americans;

18. Any projections, modeling, predictions, or other analyses prepared by Plaintiff or one or more of its members regarding any proposed changes to the TJ admissions process and any impact of such proposed changes on the racial composition of the school;

19. The remedies Plaintiff is seeking in this litigation, including the details of any admissions process You contend that the School Board should be required to implement.

Respectfully submitted,

FAIRFAX COUNTY SCHOOL BOARD

By: /s/ Sona Rewari
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CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2021, I caused a copy of the foregoing to be delivered by electronic mail to the following counsel for Plaintiffs:

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